



DEPARTMENT OF THE TREASURY  
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Department of the Treasury  
2003 - 2004 Priority Guidance Plan

Joint Statement by:

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We are pleased to announce the release of the 2003 - 2004 Priority Guidance Plan.

In Notice 2003-26, we solicited suggestions from all interested parties, including taxpayers, tax practitioners, and industry groups. We recognize the importance of public input to formulate a Priority Guidance Plan that focuses resources on guidance items that are most important to taxpayers and tax administration.

We are committed to increased and more timely published guidance. The 2003-2004 Priority Guidance Plan contains 268 projects to be completed over a twelve-month period, from July 2003 through June 2004. In addition to the items on this year's plan, the Appendix lists the more routine guidance that is published each year.

This year's plan also includes five items under the Industry Issue Resolution Program. These items are described in a separate IRS News Release. The Industry Issue Resolution Program demonstrates our continuing efforts to work with taxpayers on a cooperative basis to resolve frequently disputed tax issues.

Last year, we instituted quarterly updates of the Priority Guidance Plan. We have concluded the quarterly updates provided us greater flexibility in addressing projects that arose during the year and provided the public increased opportunities for comments on the need for additional guidance. Consequently,

we intend to update and republish the Priority Guidance Plan on a quarterly basis again this year to reflect additional guidance that we intend to publish in this plan year. These updates also may reflect guidance that we intend to publish in the following plan year. The quarterly updates will again allow us additional flexibility throughout the plan year to receive comments from taxpayers and tax practitioners relating to additional projects and to respond to developments that may arise during the plan year.

The published guidance process can be fully successful only if we have the benefit of the insight and experience of the taxpayers and practitioners who must apply the rules. Therefore, we invite the public to continue to provide us with their comments and suggestions as we write guidance throughout the plan year. Generally, recommendations for guidance will be reviewed for inclusion in the next quarterly update if received by August 31, 2003; November 30, 2003; or February 28, 2004, respectively. In addition to content, we welcome the views of taxpayers and practitioners on the dates by which guidance is necessary to implement statutory changes.

Additional copies of the 2003 -2004 Priority Guidance Plan can be obtained from the IRS website on the Internet ([www.irs.gov](http://www.irs.gov)) under Tax Professionals, IRS Resources, Administrative Information and Resources, 2003 - 2004 Priority Guidance Plan. Copies can also be obtained by calling Treasury's Office of Public Affairs at (202) 622-2960.

**OFFICE OF TAX POLICY  
AND  
INTERNAL REVENUE SERVICE**

**2003-2004 PRIORITY GUIDANCE PLAN**

**CONSOLIDATED RETURNS**

1. Guidance under section 1502 regarding transactions involving obligations of consolidated group members.
2. Guidance under section 1502 regarding rate or discount subsidy payments.
3. Final regulations under section 1502 regarding certain group structure changes.
4. Guidance under section 1502 regarding treatment of member stock.

**CORPORATIONS AND THEIR SHAREHOLDERS**

1. Final regulations regarding the effect of reorganizations on attribute reduction in respect of cancellation of indebtedness.
2. Guidance regarding redemptions of corporate stock.
3. Guidance regarding transactions involving the transfer or receipt of no net equity value.
4. Final regulations regarding taxable asset acquisitions and dispositions of insurance companies.
5. Guidance regarding the acquisition of businesses having certain nonqualified settlement funds.
6. Guidance regarding the effect of pre-closing changes of acquiror stock value on continuity of interest.
7. Guidance regarding the business purpose requirement under section 355.
8. Guidance regarding the active trade or business requirement under section 355(b).
9. Guidance regarding predecessors and successors under section 355(e).
10. Guidance regarding the assumption of liabilities in certain transfers of property.
11. Guidance regarding transfers of assets after putative reorganizations.

12. Guidance regarding certain cross-chain transactions.
13. Guidance under section 368(a)(1)(F).
14. Guidance under section 382.
15. Guidance under section 1374 regarding liquidations of C corporations.

## **EMPLOYEE BENEFITS**

### **A. Retirement Benefits**

1. Guidance on phased retirement arrangements.
2. Guidance on distribution rules for rollover contributions.
3. Guidance updating Rev. Rul. 81-100.
4. Proposed regulations under section 401(a)(4) for cash balance plans.
5. Regulations under section 401(a)(9) on required minimum distributions.
6. Guidance on whether employees of a section 501(c)(3) organization who are eligible to participate in a section 403(b) plan are excludable employees for section 401(k) and (m) plans.
7. Guidance relating to annuity plans under section 403(b).
8. Final regulations under section 408(q).
9. Guidance under section 409(p) on S corporation ESOPs.
10. Revenue ruling under section 410(b)(6)(c).
11. Guidance under section 411(a).
12. Guidance under sections 411(b)(1)(H) and 411(b)(2).
13. Guidance under section 411(d)(6).
14. Guidance on mortality tables.
15. Guidance on section 412(i) plans.

16. Additional transitional rules when a PEO retirement plan is converted to a multiple employer plan.
17. Regulations under section 415.
18. Guidance on section 416(g)(4)(H) for safe harbor 401(k) plans.
19. Guidance on use of electronic technologies for various retirement plan transactions.
20. Final regulations under section 417(a).
21. Guidance under section 417(e).
22. Guidance under section 420.
23. Guidance under section 457.
24. Revenue Procedure on model provisions for section 457(b) plans.
25. Guidance under section 3405 on actions by a duly authorized agent.

**B. Executive Compensation, Health Care and Other Benefits, and Employment Taxes**

1. Guidance under section 35 on credit for health care insurance costs of eligible individuals.
2. Guidance on election between taxable and nontaxable benefits.
3. Guidance under section 62(c) on payments to couriers.
4. Revenue ruling on electronic receipts and accountable plans.
5. Guidance under section 83.
6. Guidance on disability payments.
7. Guidance on HRAs.
8. Revenue ruling under section 125 on nonprescription drugs.
9. Guidance on debit cards.
10. Revenue ruling on the application of section 280G to various bankruptcy situations.

11. Guidance on health care provider incentive payments.
12. Final regulations on Incentive Stock Options.
13. Guidance on the employment taxation and reporting requirements applicable to interest in nonstatutory stock options and deferred compensation transferred to a former spouse incident to divorce.
14. Guidance under section 3121 regarding the definition of salary reduction agreement.
15. Guidance on the employment tax treatment of bonuses paid to employees on the signing of a collectively bargained agreement.
16. Guidance on FICA and FUTA tax with respect to incentive stock options under section 422 and employee stock purchase plans under section 423.
17. Notice on issues with respect to the treatment of choreworkers.
18. Guidance on the reporting procedures for successor organizations following Rev. Proc. 96-60.
19. Guidance under section 3504.
20. Revenue ruling under section 4980B on Medicare entitlement as a second qualifying event.
21. Guidance on tips paid to restaurant employees.
22. Guidance on the deposit requirements for employment tax in connection with the exercise of nonstatutory options.

## **EXCISE TAXES**

1. Final regulations under section 4051 regarding the definition of highway vehicle in sections 145.4051 and 48.4061(a)-1.
2. Guidance regarding the definition of highway tractors subject to the heavy truck tax under section 4051.
3. Guidance under section 4051(a)(2) and (3) regarding suitability for use.
4. Guidance under section 4081 regarding the entry into the United States of taxable fuel.
5. Final regulations under section 4252 regarding toll telephone services.

6. Guidance under section 4261 regarding resellers of air transportation.
7. Guidance under section 4291 regarding the duties of the collector of collected excise taxes.
8. Proposed regulations under section 6416(a)(4) regarding claims for gasoline tax.

## **EXEMPT ORGANIZATIONS**

1. Guidance on joint ventures between exempt organizations and for-profit companies.
2. Guidance on low-income housing partnerships and 501(c)(3) participation.
3. Guidance on downpayment assistance organizations.
4. Guidance on section 501(c)(4) organizations.
5. Guidance concerning the internet and unrelated business income tax.
6. Regulations under section 529 regarding qualified tuition programs.
7. Guidance on reporting requirements applicable to Coverdell education savings accounts.
8. Guidance on split interest trusts.

## **FINANCIAL INSTITUTIONS AND PRODUCTS**

1. Proposed regulations regarding accruals on sales of REMIC regular interests between payment dates.
2. Guidance on system upgrade payments made to utilities.
3. Final regulations under section 263(g).
4. Guidance under section 265(a)(2).
5. Proposed regulations on notional principal contracts.
6. Revenue ruling under section 446 concerning the timing rules of hedging transactions not identified under section 1.1221-2(f).
7. Final regulations addressing the treatment of inducement fees for REMIC residual interests.

8. Proposed regulations addressing valuation under section 475.
9. Final regulations under section 475(e) and (f).
10. Guidance under section 851 on the treatment of certain obligations backed by Treasury securities for RIC diversification purposes.
11. Revenue ruling under section 856 on customary services performed by REITs.
12. Advance notice of proposed rulemaking on interest-only REMIC regular interests.
13. Final regulations on REMIC residual interests.
14. Guidance on credit card transactions.
15. Guidance under section 7872.

## **GENERAL TAX ISSUES**

1. Proposed regulations under section 21 regarding the credit for household and dependent care expenses.
2. Final revenue procedure under section 23 regarding the credit for adoption expenses.
3. Guidance under section 32.
4. Guidance under section 41 regarding the research credit.
5. Final regulations under section 41 regarding the computation of the research credit in a controlled group.
6. Guidance under section 42.
7. Final regulations under sections 1.42-6 and 1.42-14 to conform to statutory changes.
8. Guidance under section 45D regarding the new markets tax credit.
9. Final regulations under sections 46 and 167 relating to normalization.
10. Guidance under sections 51 and 51A on qualified IV-A recipient.
11. Guidance regarding the section 59(e) election.



12. Revenue ruling regarding disaster relief payments to businesses.
13. Revenue ruling under sections 61 and 162 on the proper treatment of Medicaid rebates paid by pharmaceutical companies.
14. Guidance regarding the treatment of employee relocation costs.
15. Final regulations under section 121(c) regarding the reduced maximum exclusion for gain on the sale of a principal residence.
16. Revenue ruling under sections 121 and 1031 regarding like-kind exchange of a principal residence.
17. Guidance under section 152 regarding the release of a claim for exemption for a child of divorced or separated parents.
18. Guidance under section 165 regarding the deduction for worthless stock of subsidiaries for which an election under the check-the-box regulations has been made.
19. Final regulations under section 167 regarding the income forecast method.
20. Proposed and temporary regulations under section 168 relating to like-kind exchanges.
21. Final regulations under section 168 regarding depreciation of property for which the use changes.
22. Proposed and temporary regulations under sections 168 and 1400L regarding special depreciation allowance.
23. Guidance under section 168 regarding changes in classification of property.
24. Guidance under section 168 on asset classes and activity classes under Rev. Proc. 87-56.
25. Guidance under section 172 regarding specified liability losses.
26. Guidance under section 174 regarding the treatment of inventory property.
27. Guidance under section 179 on elections.
28. Final regulations under section 221 regarding interest on education loans.
29. Revenue procedure under section 274 regarding the use of statistical sampling.

30. Final regulations under section 280F regarding vans and light trucks.
31. Final regulations under section 465 regarding interest other than as a creditor.
32. Guidance under section 1031 regarding reverse like-kind exchanges of property.
33. Revenue ruling under section 1241 on cancellation of lease or distributor agreements.
34. Guidance on corporations chartered under Indian tribal law.

## **GIFTS, ESTATES AND TRUSTS**

1. Guidance under section 642(c) regarding the contribution of a qualified conservation easement.
2. Final regulations under section 643 regarding state law definition of income for trust purposes.
3. Update revenue procedures under section 664 containing sample charitable remainder unitrust provisions.
4. Guidance under section 664 regarding dividends and capital gains for charitable remainder trusts.
5. Final regulations under section 671 regarding reporting requirements for widely-held fixed investment trusts.
6. Guidance under sections 671 and 2036 regarding tax reimbursement provisions in grantor trusts.
7. Guidance under section 2032 regarding section 301.9100 relief.
8. Guidance under section 2053 regarding post-death events.
9. Guidance under section 2632 regarding the election out of the deemed allocation of the generation-skipping transfer tax exemption.
10. Guidance under section 2642 regarding issues related to the generation-skipping transfer tax exemption.
11. Guidance under section 2642 regarding qualified severance.
12. Guidance under section 2651 regarding the predeceased parent rule.
13. Guidance under section 2704 regarding the liquidation of an interest.

## **INSURANCE COMPANIES AND PRODUCTS**

1. Revenue ruling concerning reserves used to calculate required interest under section 812.
2. Guidance regarding substantially equal periodic payments under section 72(q).
3. Guidance regarding the 2001 CSO mortality tables.
4. Guidance regarding split-dollar life insurance.

## **INTERNATIONAL ISSUES**

### **A. Subpart F/Deferral**

1. Regulations on the allocation of subpart F income.
2. Regulations under section 959 on previously taxed earnings and profits.
3. Guidance on the PFIC provisions.

### **B. Inbound Transactions**

1. Guidance on cross-border pension distributions.
2. Guidance under section 1441.
3. Guidance on securities lending.
4. Guidance on the treatment of certain financial products for withholding purposes.
5. Regulations under section 1446.
6. Regulations relating to the reporting of bank deposit interest.

### **C. Outbound Transactions**

1. Guidance on international restructurings.
2. Guidance follow-up to Notice 2003-46.

### **D. Foreign Tax Credits**

1. Regulations on the allocation of foreign taxes under section 901.

2. Regulations under sections 902 and 904.
3. Regulations on look-through treatment for 10/50 company dividends (see Notice 2003-5).
4. Regulations on the change of taxable year and foreign tax credits.

#### **E. Transfer Pricing**

1. Regulations on the treatment of cross-border services.
2. Regulations on cost sharing under section 482.
3. Guidance on the APA process (Rev. Proc. 96-53).
4. Regulations on global dealing.

#### **F. Sourcing and Expense Allocation**

1. Guidance on interest expense apportionment.
2. Regulations on the allocation and apportionment of charitable contributions.
3. Regulations relating to the treatment of fringe benefits.
4. Guidance on the source of payments for cross-border use of property.
5. Regulations under sections 863(d) and (e).

#### **G. Treaties**

1. Treaty guidance on the determination of residence for dual resident companies.
2. Treaty guidance under the independent services article for nonresident partners.
3. Guidance on the procedures for claiming treaty waiver of insurance excise tax.
4. Guidance on reporting for Canadian RRSPs and other plans.

#### **H. Other**

1. Guidance on the definition of “qualified foreign corporation” for purposes of taxation of dividends received by individuals.
2. Regulations under section 269B.

3. Guidance on cross-border insurance issues.
4. Guidance on possessions issues.
5. Regulations concerning the treatment of currency gain or loss.
6. Regulations under section 1503(d).

## **PARTNERSHIPS**

1. Guidance regarding partnership transactions under section 337(d).
2. Final regulations under section 460 regarding partnership transactions for long-term contracts.
3. Final regulations under section 704(b) regarding capital account book-up.
4. Guidance under section 704(b) regarding the allocation of foreign tax credits.
5. Guidance under section 704(c).
6. Guidance under section 707 regarding disguised sales.
7. Proposed regulations under section 721 regarding partnership interests issued for services and the treatment of compensatory partnership options.
8. Update of the section 751 regulations.
9. Final regulations under section 752 regarding the assumption of partner liabilities.
10. Guidance under section 752 where a general partner is a disregarded entity.
11. Guidance on the application of section 1045 to certain partnership transactions.
12. Guidance under section 6031 on the reporting requirements of tax-exempt bond partnerships.
13. Guidance under section 7701 regarding Delaware Statutory Trusts.
14. Guidance under section 7701 regarding disregarded entities and collection issues.

## **SUBCHAPTER S**

1. Revenue ruling under section 1361 regarding QSub elections.

2. Guidance on the treatment of LIFO recapture under section 1363(d).
3. Guidance under section 7701 on deemed corporation entity elections for electing S corporations.

## **TAX ACCOUNTING**

1. Final regulations under sections 162 and 263 regarding the deduction and capitalization of expenditures for intangible assets.
2. Regulations under sections 162 and 263 regarding the deduction and capitalization of expenditures for tangible assets.
3. Guidance under sections 162 and 263 regarding the deduction and capitalization of costs incurred to fertilize established timber stands.
4. Revenue ruling regarding the deduction and capitalization of costs incurred by utilities to maintain assets used to generate power.
5. Guidance under sections 165 regarding the treatment of preproduction costs of creative property.
6. Regulations under section 263A regarding the simplified service cost and simplified production methods.
7. Guidance under section 263A regarding “negative” additional section 263A costs.
8. Final regulations under sections 263A and 448 regarding adjustments under section 481(a) for certain changes in accounting method.
9. Regulations under section 381 regarding changes in method of accounting.
10. Guidance under section 442 regarding the period for taking into account adjustments resulting from certain changes in annual accounting period by pass-through entities.
11. Revenue procedure under section 446 regarding changes in method of accounting for rotatable spare parts.
12. Regulations under section 446 regarding methods of accounting.
13. Temporary regulations under section 448 regarding the nonaccrual experience method.

14. Final revenue procedure under section 451 regarding the treatment of advance payments.
15. Revenue ruling under section 461 regarding the proper year for the deduction of payroll taxes on deferred compensation by accrual method taxpayers.
16. Regulations under section 468B regarding certain escrow funds.
17. Guidance on the tax treatment of vendor allowances involving buildouts and image upgrades.
18. Revenue ruling under section 1341 regarding the claim of right.

## **TAX ADMINISTRATION**

1. Update Rev. Proc. 85-35 regarding claims for relief by victims of terrorism.
2. Final regulations under section 5891 regarding structured settlement factoring transactions.
3. Annual compilation of Tax Shelter Listed Transactions under section 6011.
4. Final regulations regarding electronic payee statements.
5. Proposed regulations regarding what constitutes a return under section 6020(b) for purposes of applying the failure to pay penalty.
6. Guidance regarding information reporting under section 6041 for commissions paid to insurance agents.
7. Revenue ruling regarding information reporting for royalty payments under sections 6041 and 6050N.
8. Final regulations regarding information reporting and backup withholding for purchasing card transactions.
9. Revenue procedure regarding Qualified Payment Card Agents.
10. Guidance regarding information reporting with respect to payments in lieu of dividends made to individuals.
11. Final regulations under section 6045(f) regarding the reporting of gross proceeds to attorneys.
12. Final regulations under section 6050P regarding information reporting for cancellation of indebtedness.

13. Proposed regulations under section 6091 regarding hand carrying returns.
14. Proposed regulations under section 6103 regarding the disclosure of unrelated third party tax information in tax proceedings.
15. Final regulations under section 6103 regarding the definition of “agent”.
16. Revenue procedure under section 6103 regarding fees charged for furnishing certain returns and return information.
17. Final regulations regarding the ability of a return preparer to furnish a completed copy of an income tax return to the taxpayer using a medium other than paper.
18. Withdrawal of regulations under former section 6152 relating to the election by a decedent’s estate to pay income tax in installments.
19. Update Rev. Ruls. 75-365, 366, and 367 regarding interests in real estate held by a decedent.
20. Guidance regarding the use of summary assessment procedures with respect to claimed Black Reparations and similar credits.
21. Guidance under section 6213 regarding math error assessments based on a Form W-2.
22. Revenue ruling regarding the classification of items and the statute of limitations under the TEFRA partnership provisions.
23. Revenue ruling under section 6231 regarding the application of certain TEFRA partnership provisions to disregarded entities.
24. Final regulations under section 6302 regarding the minimum threshold for depositing FUTA taxes.
25. Proposed regulations under sections 6320 and 6330 regarding collection due process.
26. Notice regarding collection issues relating to property held as a tenancy by the entirety arising from the Supreme Court’s opinion in United States v. Craft.
27. Revenue ruling regarding the limitations on setoff.
28. Revenue ruling regarding setoff with respect to a taxpayer in bankruptcy.



29. Proposed regulations under section 6655 regarding estimated tax payments by corporations.
30. Final regulations under sections 6662 and 6664 regarding penalties relating to tax shelters.
31. Revenue procedure regarding the submission and processing of offers-in-compromise.
32. Final regulations imposing a user fee for offers-in-compromise.
33. Guidance necessary to facilitate electronic tax administration.
34. Final regulations under section 7430 regarding qualified offers.
35. Proposed regulations under section 7430 regarding miscellaneous changes made by TRA 97 and RRA 98.
36. Update Rev. Proc. 87-24 regarding docketed Tax Court cases.
37. Proposed regulations regarding third party and John Doe summonses.
38. Revenue procedure regarding the early examination of questionable transactions.
39. Revisions to Circular 230 regarding practice before the IRS.
40. Revenue procedure expanding the prefilling agreement program.

## **TAX EXEMPT BONDS**

1. Guidance under section 141 regarding naming rights.
2. Guidance on correction alternatives and voluntary compliance for tax exempt bond provisions.
3. Final regulations under section 141 on refundings.
4. Proposed regulations under section 141 regarding allocation and accounting provisions.
5. Regulations under section 142 regarding solid waste disposal facilities.
6. Guidance under section 143 regarding mortgage insurance fees.
7. Guidance under section 143 regarding average area purchase price.

8. Final regulations under section 148 regarding brokers' commissions and similar fees.
9. Guidance on arbitrage.
10. Guidance under section 150 regarding change in use provisions.
11. Guidance under section 1397E regarding qualified zone academy bonds.

## **APPENDIX - Regularly Scheduled Publications**

### **JULY 2003**

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in July 2003.
3. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

### **AUGUST 2003**

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue procedure providing the amounts of unused housing credit carryover allocated to qualified states under section 42(h)(3)(D) for the calendar year.
3. Notice providing the inflation adjustment factor to be used in determining the enhanced oil recovery credit under section 43 for tax years beginning in the calendar year.
4. Notice providing the applicable percentage to be used in determining percentage depleting for marginal properties under section 613A for the calendar year.
5. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the second half of 2003 for use in valuing personal flights on employer-provided aircraft.
6. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in August 2003.
7. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

### **SEPTEMBER 2003**

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.

2. Revenue ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period July through September, 2003.
3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period October through December 2003.
4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in September 2003.
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
6. Revenue procedure under section 62 regarding the deduction and deemed substantiation of federal standard mileage amounts.
7. Revenue procedure under section 62 regarding the deduction and deemed substantiation of federal travel per diem amounts.
8. Update Notice 2002-62 to add approved applicants for designated private delivery service status under section 7502(f). Will be published only if any new applicants are approved.

#### OCTOBER 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in October 2003.
3. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
4. Revenue procedure under section 1 and other sections of the Code regarding the inflation adjusted items for 2004.
5. Revenue procedure providing the loss payment patterns and discount factors for the 2003 accident year to be used for computing unpaid losses under section 846.
6. Revenue procedure providing the salvage discount factors for the 2003 accident year to be used for computing discounted estimated salvage recoverable under section 832.

7. Update of Rev. Proc. 2001-53 listing the tax deadlines that may be extended by the Commissioner under section 7508A in the event of a Presidentially-declared disaster or terrorist attack.

#### NOVEMBER 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue ruling providing the “base period T-Bill rate” as required by section 995(f)(4).
3. Revenue ruling setting forth covered compensation tables for the 2004 calendar year for determining contributions to defined benefit plans and permitted disparity.
4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in November 2003.
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
6. Update of Rev. Proc. 2001-52 regarding adequate disclosure for purposes of the section 6662 substantial understatement penalty and the section 6694 preparer penalty.
7. News release setting forth cost-of living adjustments effective January 1, 2004, applicable to the dollar limits on benefits under qualified defined benefit pension plans and other provisions affecting certain plans of deferred compensation.

#### DECEMBER 2003

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period October through December, 2003.
3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period January through March 2004.

4. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in December 2003.
5. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
6. Revenue procedure setting forth, pursuant to section 1397E, the maximum face amount of Qualified Zone Academy Bonds that may be issued for each state during 2004.
7. Federal Register notice on Railroad Retirement Tier 2 tax rate.

#### JANUARY 2004

1. Revenue procedure updating the procedures for issuing private letter rulings, determination letters, and information letters on specific issues under the jurisdiction of the Chief Counsel.
2. Revenue procedure updating the procedures for furnishing technical advice to certain IRS offices, in the areas under the jurisdiction of the Chief Counsel.
3. Revenue procedure updating the previously published list of “no-rule” issues under the jurisdiction of certain Associates Chief Counsel other than the Associate Chief Counsel (International) on which advance letter rulings or determination letters will not be issued.
4. Revenue procedure updating the previously published list of “no-rule” issues under the jurisdiction of the Associate Chief Counsel (International) on which advance letter rulings or determination letters will not be issued.
5. Revenue procedure updating procedures for furnishing letter rulings, general information letters, etc. in employee plans and exempt organization matters relating to sections of the Code under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division.
6. Revenue procedure updating procedures for furnishing technical advice in employee plans and exempt organization matters under the jurisdiction of the Commissioner, Tax Exempt and Government Entities Division.
7. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
8. Revenue ruling setting forth the prevailing state assumed interest rates provided for the determination of reserves under section 807 for contracts issued in 2003 and 2004.

9. Revenue ruling providing the dollar amounts, increased by the 2003 inflation adjustment for section 1274A.
10. Revenue ruling setting forth the amount that section 7872 permits a taxpayer to lend to a qualified continuing care facility without incurring imputed interest, adjusted for inflation.
11. Revenue procedure providing procedures for limitations on depreciation deductions for owners of passenger automobiles first placed in service during the calendar year; amounts to be included in income by lessees of passenger automobiles first leased during the calendar year; and the maximum allowable value of employer-provided automobiles first made available to employees for personal use in the calendar year.
12. Revenue procedure providing the domestic asset/liability percentages and the domestic investment yield percentages for taxable years beginning after December 31, 2002, for foreign companies conducting insurance business in the U.S.
13. Revenue procedure updating procedures for issuing determination letters on the qualified status of employee plans under sections 401(a), 403(a), 409, and 4975.
14. Revenue procedure updating the user fee program as it pertains to requests for letter rulings, determination letters, etc. in employee plans and exempt organizations matters under the jurisdiction of the Office of the Commissioner, Tax Exempt and Government Entities Division.
15. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in January 2004.
16. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

#### FEBRUARY 2004

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
3. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in February 2004.

## MARCH 2004

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Notice providing resident population of the states for determining the calendar year state housing credit ceiling under section 42(h), the private activity bond volume cap under section 146, and the qualified public educational facility bond volume cap under section 142(k).
3. Revenue ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period January through March, 2004.
4. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period April through June, 2004.
5. Revenue ruling setting forth the terminal charge and the standard industry fare level (SIFL) cents-per-mile rates for the first half of 2004 for use in valuing personal flights on employer-provided aircraft.
6. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in March 2004.
7. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

## APRIL 2004

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue ruling providing the average annual effective interest rates charged by each Farm Credit Bank District.
3. Notice providing the inflation adjustment factor, nonconventional fuel source credit, and reference price for the calendar year that determines the availability of the credit for producing fuel from a nonconventional source under section 29.
4. Revenue procedure providing a current list of countries and the dates those countries are subject to the section 911(d)(4) waiver and guidance to individuals who fail to meet the eligibility requirements of section 911(d)(1) because of adverse conditions in a foreign country.



5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in April 2004.
6. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.

#### MAY 2004

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in May 2004.
3. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.
4. Revenue procedure providing guidance for use of the national and area median gross income figures by issuers of qualified mortgage bonds and mortgage credit certificates in determining the housing cost/income ratio under section 145.

#### JUNE 2004

1. Revenue ruling setting forth tables of the adjusted applicable federal rates for the current month for purposes of sections 42, 382, 1274, 1288, and 7520.
2. Revenue ruling providing the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period April through June, 2004.
3. Revenue ruling under section 6621 regarding the applicable interest rates for overpayments and underpayments of tax for the period July through September 2004.
4. Notice providing the calendar year inflation adjustment factor and reference prices for the renewable electricity production credit under section 45.
5. Notice setting forth the weighted average interest rate and the resulting permissible range of interest rates used to calculate current liability for the purpose of the full funding limitation of section 412(c)(7) for plan years beginning in June 2004.
6. Revenue ruling under section 472 providing the Bureau of Labor Statistics price indexes that department stores may use in valuing inventories.